

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: :
Shanita D. Outing : Chapter 13
: No.: 20-10679-ELF
Debtor(s) :

**RESPONSE OF DEBTOR TO THE MOTION FOR RELIEF OF AUTOMATIC
STAY FILED BY BANK OF AMERICA, N.A.**

Debtor, Shanita D. Outing, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Bank of America, N.A. hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Denied that Debtor failed to make timely payments to Movant.
5. Admitted
6. Admitted.
7. Denied. Debtor avers all payments made to date.
8. No response required.
9. Admitted.
10. Debtor opposes the same.
11. Denied.
12. No objection.
13. Denied.
14. Denied.

WHEREFORE, based on the aforementioned, Debtors respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: March 18, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West
Standing Chapter 13 Trustee
Electronic Notice

Andrew Spivack, Esq.
Attorney for Movant *Bank of America, N.A.*
Electronic Notice to *PABKR@brockandscott.com*

Dated: March 18, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107